

Message

---

**From:** Dourson, Michael (doursoml) [doursoml@ucmail.uc.edu]  
**Sent:** 7/22/2017 12:29:57 PM  
**To:** Jackson, Ryan [jackson.ryan@epa.gov]  
**CC:** Munoz, Charles [munoz.charles@epa.gov]; Palich, Christian [palich.christian@epa.gov]; Beck, Nancy [Beck.Nancy@epa.gov]  
**Subject:** A short note  
**Attachments:** 7593F5DA-73B2-4FC3-8657-58C18E332CA2[2].png

Ryan

You probably already know this, but I will be coming into Washington, D.C. for the whole week of July 31, arriving Monday morning at about 9 am. I have Senator meetings on Tuesday, set up by Christian Palich, and he will likely be setting up additional meetings throughout the week. However, I would also be happy to meet with you, Nancy and other EPA staff, if this is helpful. For example, Monday is completely open.

Please advise at your leisure.

Cheers!

Michael

*-- It is the mark of an instructed mind to rest satisfied with the degree of precision which the nature of the subject permits and not to seek an exactness where only an approximation of the truth is possible. Aristotle*



---

**From:** Michael Dourson <doursoml@ucmail.uc.edu>  
**Date:** Friday, July 21, 2017 at 10:39 PM  
**To:** "Jackson, Ryan" <jackson.ryan@epa.gov>  
**Cc:** "Munoz, Charles" <munoz.charles@epa.gov>  
**Subject:** EPA Nomination

Ryan

I very much appreciate the work you put into my nomination. I expected some pushback from several environmental groups, and I suppose I was not disappointed. In contrast, I have ask some of my ENGO colleagues to write letters in support to the Senate EPW.

Our group has heard all of these stories before and have ready answers to each of them. For example, the recent piece by EWG on PFOA has a least one half truth, but it then it goes off the rails with inaccuracies and implications about our work, for which we received in 2002 an Environmental Stewardship Award from the State of West Virginia. Statements of "extensive ties to the chemical industry and previous connections to big tobacco" claims of the EDF and others on the various websites are highly inaccurate or false. The facts are:

- TERA and the RSC [Risk Science Center at the University of Cincinnati, College of Medicine] has on average 1/3 industry funding and 2/3 government funding. To say that we have extensive ties to the chemical industry is false, unless one is to also say in the same breath that we are twice the extensive

ties to government. No normal person would say that. EDF is being disingenuous or committing a sin of omission to use the religious angle.

- Our “big tobacco” connection is all of the following. I will leave it to you to judge whether this connection warrants the current attention.
  - TERA has received \$635 for work done directly for tobacco companies over a period of more than 20 years. TERA has indirectly received approximately \$6,000 for work done as a subcontractor to a consulting firm whose client was funded by tobacco companies (TERA had no direct connection with the tobacco company). TERA conducts training courses in risk assessment, particularly dose-response assessment, for many government agencies and companies, as well as in public workshops open to all. TERA was paid less than \$6,000 plus travel expenses for one training course for a tobacco company. TERA has trained hundreds of scientists in the public training courses and some of these people (less than a dozen) worked for tobacco companies and their fees were likely paid for by their companies.
- The description of our West Virginia river spill peer review by EDF where we supposedly did not disclose prior work to companies that contributed to the problem, forgot to mention that we had a COI description of our work (as well as the other reviewers) before the meeting and updated it at the meeting. In fact, EPA inspector general cited TERA as being the only group that documented its COI in a peer review report in their 2009 study of the IRIS (attached, see page 12). EDF also forgot to mention that we lowered the safe dose by 8-fold for the West Virginia chemical over the value established by the federal government. Hardly helping industry with this move.
- The description of our work for the Perchlorate Study Group forgot to mention that we lowered the the original industry safe dose of perchlorate by 500-fold. We also independently published our on assessment in 2004 that was lower than a new industry standard by about 8-fold. EPA had yet a lower value, that the NAS subsequently raised (TERA’s value was much closer to the NAS value than EPA’s). Importantly, TERA’s value appears to be similar to what EPA is now contemplating in 2017, 13 years after our original work.
- The Center for Progressive Reform report has been thoroughly discredited (TERA press release attached, I can also send their annotated text with specifics).

I could go on, and will happily do so if you feel the need for any response. I would also be willing to sit down with a reporter to go over each supposed problem and counter them.

Your call...

Cheers!

Michael

— *Risk Science Center (formerly TERA Center) sponsors the International Toxicity Estimates for Risk (ITER) database of risk assessment values on Toxnet: <http://toxnet.nlm.nih.gov/>*

